EXHIBIT B

Law Offices
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Attorneys for Defendants Jones Lang LaSalle Americas, Inc., Peter Riguardi, and Stephen Schlegel

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

YORON COHEN,

Plaintiff,

v.
JONES LANG LASALLE IP, INC.,
PETER RIGUARDI,
and STEPHEN SCHLEGEL,

Defendants.

CIVIL ACTION NO. 17-cv-03471 (DLC)

Defendants Jones Lang LaSalle Americas, Inc. ("JLL," incorrectly identified in the Complaint as "Jones Lang LaSalle IP, Inc."), Peter Riguardi ("Riguardi"), and Stephen Schlegel ("Schlegel") (together, "Defendants"), by and through their attorneys, Morgan, Lewis & Bockius LLP, hereby serves their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). Defendants reserves the right to amend, supplement, or modify these disclosures in future discovery responses and/or as required by Fed. R. Civ. P. 26(e) as additional investigation or discovery reveal new facts or provide new significance to known information not presently deemed responsive.

GENERAL STATEMENT

1. By providing information pursuant to any provision of Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants do not concede the materiality of the subject to

which it refers. Defendants' responses are made expressly subject to, and without waiving or intending to waive, any questions or objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence or for any other purpose, of any of the information produced or identified in any proceeding including the trial of this action or any subsequent proceeding.

- 2. Defendants object to the provisions of Rule 26(a)(1) to the extent that they demand information or documents that are protected from disclosure under the attorney-client privilege or work-product doctrine.
- 3. Identification of any document that is privileged or is otherwise immune from discovery shall not constitute a waiver of any privilege or of any other ground for objecting to discovery with respect to that document or any other document, or its subject matter, or the information contained therein, or of Defendants' right to object to the use of any such document or the information contained therein during any proceeding in this litigation or otherwise.

I. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION

At present, in addition to Plaintiff and Defendants Riguardi and Schlegel, Defendants have identified the following persons as being likely to have discoverable information that Defendants may use to support their defenses. The individuals listed below may be contacted only through Defendants' counsel, Morgan, Lewis & Bockius LLP, except as otherwise noted.

1. Gavin Morgan, former JLL Vice Chairman. Mr. Morgan has knowledge regarding Plaintiff's affiliation with JLL, JLL's compensation arrangement with Plaintiff and Plaintiff's partners, the performance of Plaintiff and Plaintiff's partners, and the voluntary decision by Plaintiff and his partners to leave JLL to join Colliers Capital Markets ("Colliers").

Dated: October 10, 2017 MORGAN, LEWIS & BOCKIUS LLP

By: <u>/s/ Jason D. Burns</u> Jason D. Burns

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by email and U.S. Mail a true and correct of Defendants' foregoing Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on this 10th day of October, 2017 on:

Harder Mirell & Abrams, LLP Anthony Harwood, Esq. 488 Madison Avenue, 18th Floor New York, New York 10022 Tony.Harwood@aharwoodlaw.com

Attorneys for Plaintiff

/s/ Jason D. Burns

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